

**IV.D. Narrative Information Sheet**

Chad E. Spence, Mayor  
Jan Walters, Clerk-Treasurer  
Monte G. Poling, City Manager  
Cobie Wells, Chief of Police  
Steve Shoemaker, Fire Chief  
[www.unioncity-in.com](http://www.unioncity-in.com)

**1. Applicant Identification:**

City of Union City  
105 N Columbia Street  
Union City, IN 47390

**2. Funding Requested:**

a. Assessment Grant Type: Community-wide

b. Federal Funds Requested:

- i. \$300,000
- ii. We are not requesting a Site-specific Assessment Grant waiver of the \$200,000 limit.

**3. Location:**

- a. City of Union City
- b. Randolph County
- c. Indiana

**4. Property Information for Site-Specific Proposals: Not applicable****5. Contacts:**

a. Project Director:

Mr. Monte Poling  
City Manager  
765-964-6534  
[citymanager@unioncity-in.gov](mailto:citymanager@unioncity-in.gov)  
105 N Columbia Street  
Union City, IN 47390

b. Chief Executive/Highest Ranking Elected Official:

Mayor Chad Spence  
765-964-6534 ext. 201  
[mayor@unioncity-in.gov](mailto:mayor@unioncity-in.gov)  
105 N Columbia Street  
Union City, IN 47390

**6. Population: City of Union City – 3,396 (2014-2018 American Community Survey (ACS) 5-Year Estimate)**

7. Other Factors Checklist:

<b>Other Factors</b>	<b>Page#</b>
Community population is 10,000 or less.	Pg. 1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Pg. 3
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

<sup>1</sup>Because Applicant is a municipality (similar to a county), population data is reported in census tracts in which each priority site is located.



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

October 28, 2020

Mr. Monte Poling, City Manager/Grant Manager  
Mayor's Office  
City of Union City  
105 N Columbia Street  
Union City, Indiana 47390

Re: IDEM Acknowledgement Letter  
U.S. EPA Brownfields Grant Proposal  
Community-wide Assessment  
City of Union City  
Randolph County, Indiana

Dear Mr. Poling:

This letter is provided in support of the City of Union City's (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is applying for \$300,000.

It is IDEM's understanding that the City will use this funding to expand its existing brownfields inventory and prioritize sites based on redevelopment potential, possible threats to human health and the environment, community environmental justice, and community input. IDEM supports additional plans to conduct environmental assessment activities systematically for at least five former commercial/industrial properties within the W. Pearl Street/W. Oak Street Corridor (POC) as the target area in the community, including other possible sites identified in the updated brownfield inventory.

IDEM believes that the City of Union City has demonstrated its commitment to redeveloping brownfields by having taken advantage of financial and/or technical assistance offered by the U.S. EPA and the Indiana Brownfields Program (e.g., several

sites/types of assistance). This assessment grant funding will help the City continue its efforts to assess brownfields in the community to facilitate large-scale mixed redevelopment plans (e.g., commercial, light manufacturing, residential, or park land end use).

Should an opportunity arise for the City to need petroleum eligibility determinations and/or cleanup/closure or liability assistance at any of the sites investigated with this grant funding, IDEM realizes that the City plans to enroll sites for closure via the Indiana Brownfields Program or the IDEM Voluntary Remediation Program. IDEM and the Indiana Brownfields Program are committed to continuing their support of brownfield redevelopment in Union City by providing technical assistance and program coordination.

Based on the information submitted and experience, IDEM considers the City of Union City an excellent candidate to receive U.S. EPA grant funding to continue its brownfield redevelopment endeavors, which support Indiana's brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with the City of Union City. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program at (317) 234-0235 or at [moertel@ifa.in.gov](mailto:moertel@ifa.in.gov).

Sincerely,



Bruce A. Oertel, Chief  
Remediation Services Branch  
Office of Land Quality

*BAO/mmo*

cc: *(via electronic transmission)*  
Len Hinrichs, BCA Environmental Consultants, LLC

**1 Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Background & Description of Target Area:** The City of Union City (City) is located in eastern Indiana, 75 miles northeast of Indianapolis via I-70 and IN-227. Founded in 1849 on the Ohio border, Union City (pop. 3,396) (2018 ACS), along with its twin city (Union City, OH), was known as the “Hub City” due to the confluence of 4 historic railroads within their limits. Even now, our proximity to I-70 allows quick access to Indianapolis, Chicago, Columbus, and Cincinnati. Historically, Union City grew as a transportation hub, which supported agriculture and manufacturing industries such as automotive components & assembly, metal plating & finishing, agricultural products, and lumber. Several railroads bisected the City and industry and commerce centered along these transportation corridors. Historic neighborhoods developed, allowing residents to work, and play near their homes. However, as with much of the Midwest, our manufacturing base declined in the 1960s and 1970s, resulting in a 17% population decline since 1960 as jobs moved away (worldpopulationreview.com). Company closures and layoffs have especially hurt our local workforce in the last 20 years and many of the businesses remaining in the downtown area have reduced their operations resulting in vacant or underutilized properties. Historic neighborhoods in and around our downtown and rail corridors have been pulled down with this decline, leaving behind a community burdened with more than 25 brownfields. Union City is a “micro” community with less than 10,000 residents, so our entire city is affected by brownfield properties; however, our Pearl and Oak Streets Corridor is where many of Union City’s brownfields are located, and we have selected this as our target area where EPA Brownfield Assessment Grant funding will have the greatest impact.

**Pearl & Oak Streets Corridor (POC)** – bounded roughly by Oak Street to the north, Howard St. to the east, Pearl St. to the south, and Jackson Pike to the west, and within Census Tract 9516, the 0.2 mi<sup>2</sup> POC is interspersed with numerous historical brownfields from former commercial, municipal, and industrial properties which are located in low-income residential or mixed-use areas. Its high visibility as an extension of our historic downtown make the POC a focal point of our community.

The residents living among brownfields in the POC experience lower Median Household Income (MHI), and higher poverty rates, including child and elderly poverty rates, when compared with the US, State, and City (see 2.a.i.). Even with such social and economic constraints, we recognize the great redevelopment potential of the POC. We are working hard to repurpose and reshape our community after much of our business and commerce closed or moved away. For example, city leaders recently completed a study for revitalization of the Kerr Block, a large, vacant, historic downtown commercial building. The study assessed the structure’s condition and provided design recommendations for a potential new use as a multi-purpose facility to house public TV studio space, a computer wifi lounge, and retail space. This confirms that we are investing in infrastructure and amenities to make Union City a premier location to live, learn, work, and shop.

Our Revitalization Plans (see 1.b.i.) identify mixed use development, including commercial and light industrial facilities that will provide employment; affordable housing; park/recreational space; and enhanced community walkability as the development goals for the POC and our community as a whole. We have made a focused effort to invest in the POC to address priority brownfields (1.a.ii) and leverage additional funding for these depressed areas of our community.

**1.a.ii. Description of the Priority Brownfield Site(s):** The priority brownfields targeted for this grant are vacant or underutilized commercial and/or industrial properties (reflecting our industrial history) located in low-income residential and/or mixed-use areas of the POC. To date, over 25 brownfield properties have been identified and inventoried in the City. Our priority brownfields impact large portions of the POC neighborhoods where they are located and threaten both the physical and financial wellbeing of the community. For example, the extent of environmental conditions of the former bus body plant are mostly unknown, adding to the already high health risks to adjoining neighborhoods from potential petroleum, solvents, and/or other industrial chemical releases. The City has plans to repurpose this site, removing the environmental and health threats, and transform it into a modern commercial or light industrial development, bringing much needed jobs to our community (per our Revitalization Plans (1.b.i.)).

The priority sites listed in Table 1 offer the greatest opportunity to trigger successful reuse/resurgence in our target areas. The historical uses of these sites, likely environmental issues, potential health effects to those exposed to these sites, and planned reuse are summarized below.

Table 1 – Priority Brownfield Sites and Impacts

Priority Site, Size, Proximity to Target Area Residents	Historic Use / Current Use & Condition / Planned Reuse (further discussed in Section 1.b.i.)	Suspected Contaminants*
<b>1101 W Pearl St</b> – 1.4 acres, adjoins low-income neighborhood	Former bus body manufacturing facility / Vacant lot / Commercial-industrial development	Petroleum, metals, VOCs, PAHs
<b>931 W Pearl St.</b> – 0.7 acre, adjoins low-income neighborhood, < 600 ft. from a park	Former automotive parts manufacturer / Underutilized building / Commercial-industrial development	Petroleum, metals, VOCs, PAHs
<b>309 W Pearl St.</b> – 0.5 acre, adjoins low-income neighborhood	Former police department / Vacant building, poor condition / New public space	Petroleum, VOCs, PAHs, asbestos
<b>325-339 W Oak St.</b> – .5 acre, adjoins low-income neighborhood	Former retail including electronics / Vacant apartment building / Public parking facility	Petroleum, asbestos, VOCs, PAHs, metals
<b>228 W Oak St.</b> – .05 acre, adjoins low-income neighborhood	Former retail, consignment shop / Underutilized building / Commercial property	Petroleum, asbestos, VOCs, PAHs, metals
*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include damage to: skin, liver, kidneys, heart, spleen, nervous, respiratory, hormonal, blood, and immune systems, and may also cause neurological damage, birth defects and cancer ( <a href="http://www.atsdr.cdc.gov">www.atsdr.cdc.gov</a> ).		

These sites are our highest priorities because they will meet immediate needs in our community, align with our revitalization plans, and redevelopment is imminent if EPA funding is awarded. Once redeveloped, they will serve as examples of success, triggering more investment. If properties outside our target area becomes a priority during the grant period, we may choose to invest some grant funding on them; however, our focus for this grant will remain the POC.

**1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans:** Our 2016 Strategic Investment Plan (Stellar), 2018 Randolph County Comprehensive Plan (draft), and 2018 Regional Development Plan (Revitalization Plans) specify the that the path for economic growth and development in our community focuses on quality, with a vision for a vibrant, diverse, and thriving destination/gathering place, with social and economic equity; good environmental quality; community health; quality employment and education; civic engagement; universal access to amenities; and an enhanced role as a regional economic hub. We will attain this through collaboration, creativity, cultural vitality, inclusion, and sustainability, providing a welcoming environment for residents and businesses and continuing to develop in a disciplined, logical way that capitalizes on existing assets and infrastructure. The key to our revitalization of the POC is brownfields reuse/revitalization. The City is requesting \$300,000, the majority of which will be used to complete Phase I and Phase II ESAs in the POC providing the initial, highest risk investment necessary for brownfield reuse. Funding will also be committed to updating/prioritizing our existing inventory and conducting cleanup planning activities. These funds will help us reach reuse goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the target area. This approach will maximize grant value and trigger further environmental and reuse funding (1.c.i). The vacant former bus body manufacturer and vacant former automotive parts manufacturing properties on Pearl St. are planned for commercial or industrial redevelopment to bring in new jobs to replace those lost from former industry on these sites. The former police department on Pearl St. will become a new public space; the former electronics retail property on Oak St. will become desperately needed downtown parking along the proposed Oak Street Trail to support new and existing businesses; and the former consignment shop is slated for redevelopment as a commercial property. However, additional funding from an EPA grant is needed to complete the environmental due diligence and trigger redevelopment. EPA grant funding will fuel this aggressive revitalization effort creating needed jobs, affordable housing, and walkable greenspace within the target area, improving the quality of life in the POC. Significant resources have already been pledged for the reuse of POC properties as indicated in 1.c.i, and with EPA funds to cover environmental costs, we will make the outcomes outlined below a reality.

**1.b.ii Outcomes & Benefits of Reuse Strategy:** Brownfield assessments will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods. This will be accomplished in the POC where the largest number of low-income, minority, and other sensitive populations reside, supporting environmental justice goals. Reuse of brownfields will generate higher tax revenue for the City, and through increased investment. In addition,



jobs will be created, new residential units will be constructed, and property values will be enhanced. Reuse of all the priority sites listed in 1.a.ii, has the potential to create over 200 jobs and generate an estimated \$225K in annual income tax revenue. Additionally, since these target sites are in a designated Tax Increment Financing (TIF) district, incremental increases in property taxes will be retained for redevelopment purposes by the City. By our calculations, this could generate up to \$300K in annual incremental tax revenue which will be reinvested in the POC. With an investment from the EPA to fund the assessment of the properties considered for reuse, leveraged funding for the effort is much more likely to be realized, bringing the needs outlined in the Union City Revitalization Plans that much closer to fruition. For example, reuse of the former bus body manufacturer site will remove the threat associated with environmental contamination (VOCs and metals.) and blight will be eliminated, reducing crime that the abandoned property encourages.

Redevelopment of priority sites will remove environmental threats, eliminate blight, reduce crime, and stimulate private sector investment in surrounding properties, generating increased tax revenues on the adjoining and nearby sites. Temporary jobs to construct, remediate, and reuse sites, as well as permanent jobs to operate new businesses will be created, stimulating other private sector investment. During all phases of the revitalization process, we will promote/encourage the re-use of existing buildings and infrastructure, including implementing building codes that require or promote energy efficiency measures such as solar street lighting, energy efficient lighting, low-flow showers/toilets, geothermal heating/cooling, etc. Residents will benefit from increased property values or may seek housing with energy efficiency and less maintenance costs. All of our priority sites are located within our federally designated Opportunity Zone (OZ), and we will market them aggressively as excellent tax shelters under OZ tax incentives, attracting private funds to our low-income areas. We have identified 6 Opportunity Funds in Indiana, and nearly 70 investing in OZ projects nationwide. We will engage them as brownfield revitalization progresses on this and other sites.

**1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse:** Our City has a history of leveraging investment in projects throughout the community. For example, the historic Backstay Welt building on Oak St. is currently being repurposed into the \$9M Backstay Lofts, consisting of 50 much-needed affordable apartments, a job training center, and community space. More investment is planned, focusing on the POC. Without EPA funding for the initial high-risk environmental assessment of these sites, brownfield revitalization will stagnate. Union City will pursue many different funding sources from the state and federal levels, as well as private sector investments, as outlined below.

- *Private Funding* - > \$8M has already been secured to redevelop downtown historic structures, residential/mixed-use commercial assets, and greenspace amenities on properties in the target areas.
- *Tax Increment Financing (TIF)* -- Property tax revenue used as a subsidy for redevelopment, infrastructure, and other improvements. Up to \$75K in TIF funding pledged by the City to aid in the redevelopment of brownfields.
- *Opportunity Zones (OZ)* – All of our priority sites are located within our federally-designated Opportunity Zone (see 1.b.ii).
- *EPA* - Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the City (\$300K-\$1M).
- *Federal Highway Administration* - Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+).
- *Indiana Economic Development Corp.* - Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower (Est. \$1M+).
- *Indiana Brownfields Program* - Low-interest/partially forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (Est. \$1M).
- *Indiana Finance Authority* - SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites (\$500K+).
- *Indiana Brownfields Program* - Section 128A funding may be used to complete the investigation of sites identified and/or partially assessed in this Grant (est. \$75K)
- *Excess Liability Trust Fund* - State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)

- *Liability Insurance Funding* - Indiana courts have ruled that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The City will make efforts to apply this funding source to all eligible sites, including privately and municipally owned property (often \$1-3M/site). Insurance coupled with EPA assessment funding has been used on brownfields in many communities in Indiana (e.g. Plymouth, Logansport, Jeffersonville), commonly leveraging hundreds of thousands, or even millions in assessment and cleanup funding.

A detailed funding plan will be developed for brownfield sites/areas as assessment projects progress, and each site will have a unique funding plan depending on individual site status and eligibility.

**1.c.ii. Use of Existing Infrastructure:** Our Revitalization Plans' land use goals emphasize the build-out of existing parcels, and rehabilitation and infill development in our city's traditional core neighborhoods before additional land is considered for development. Modern utility infrastructure is present in all target areas (3-phase electricity, natural gas, city water and sewer, telephone and fiber optic service), providing connectivity to new development. It is robust enough to handle the added capacity required by any planned reuse and will utilize existing services and other infrastructure (roads, curb cuts, on/off-street parking, & nearby utilities) to attract new investment in area brownfields, reducing site reuse costs. With revitalization ranging from residential to industrial, existing infrastructure will allow for easy access for commercial/industrial development, enabling residents the opportunity to work and live in the same neighborhood, creating a walkable community. Traditional transportation infrastructure will be complemented by pedestrian connectivity, bicycle improvements, and universal accessibility. All priority sites in 1.a.ii are near IN-227, and revitalization will link them directly with I-70, other parts of the City, and other communities. Additional roads or trails necessary for planned reuse (including connection to planned regional trail systems) will be sought from the US Dept. of Transportation Better Utilizing Investments to Leverage Development (BUILD) Grant program. If additional infrastructure is needed, we will utilize a combination of local funds (when available) and CDBG funds to meet the development's infrastructure needs.

**2. Community Need and Community Engagement, a. Community Need, i. The Community's Need for Funding:** Union City needs US EPA's financial assistance because we do not have the necessary funds in our general budget (estimated \$3.9M for 2021) to address brownfields anywhere in our community, let alone in our target area. Indicators of need in the POC is evident in key economic and demographic factors suffered by our target area residents, including low income, poverty, and crime. MHI in the POC is 63% less than that in the US and poverty is over 90% higher in the POC than in the US. Child poverty is 99% higher in the POC than the US (19.5%) and elderly poverty is 63% higher in the POC than in the US (9.3%) (see 2.a.ii.(1) for exact figures) (all stats from 2018 ACS unless otherwise noted). Low income combined with the large number of vacant buildings on brownfields has resulted in an overall increase in crime within the POC, which according to City officials, is more than two times higher than in the City as a whole, and in particular, violent crimes, which increased by 54% in our City from 2014 to 2016 (last year reported -- FBI's Universal Crime Report), further limiting local government resources, and priority brownfield sites listed in 1.a.ii add to the financial burden of target area residents by suppressing residential property values and adding to municipal expenditures through reduced tax base, and additional public safety services to brownfield sites due to criminal activity.

The loss of large, high paying employers (Union City Body Co. (UCBC), AO Smith (Westinghouse), Sheller Globe Co., and Mengel Cabinets) have resulted in more than 400 lost jobs in the last 15 years. The drain of jobs and talent adds substantially to economic challenges facing our City, diminishing local income and property tax revenues and increasing poverty in our target areas.

The reuse goals for most of Union City's priority brownfield sites in 1.a.ii are to create a blend of mixed-use commercial with quality, affordable housing, additional park and trail greenspace, as well as appropriate industrial/commercial redevelopment to rejuvenate our workforce. With a budget currently only able to provide essential services and much-needed infrastructure maintenance, we lack the discretionary funds necessary to complete the proactive assessment and planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers



to seek out and invest in them, and eliminating the risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow Union City to fulfill our revitalization needs for our target areas, creating unique, healthy, safe, and walkable neighborhoods.

**2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations:** Because many of our target area brownfields are in and around our most sensitive populations (low-income residents, children and elderly living in poverty, and women who are pregnant or of childbearing age), brownfields have likely adversely impacted their health. Median Household Income (MHI) (\$22,071) is significantly less than the US (\$60,293), state (\$54,325), and even the City (\$31,762), resulting in a staggering 27% of persons living in poverty (significantly higher than US/state (14.1%), or City (23%)). This is especially true for our children (28% living in poverty vs. the US (19.5%) and state (19.8%)) and our elderly (15.2% living in poverty vs. the US (9.3%) and state (7.5%)) (all stats from 2018 ACS unless otherwise noted). Brownfield sites are often unsecured and trespassers, including children, risk exposure to toxic chemicals, asbestos, and unsafe structures, causing soil and groundwater contamination. Contaminants such as metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, and asbestos are potentially causing harm to our sensitive populations including children and women who are pregnant or who may become pregnant. For example, the former bus body manufacturing site, adjoining a low-income neighborhood, is potentially impacted with petroleum, metals, VOCs, PAHs, and other contaminants that are known to cause various cancers, some of which are experienced by Union City residents at rates higher than Indiana 2.a.ii(2)). Finally, 84% of houses in the POC are older than 1980, making them much more likely to contain lead-based paint, a significant threat to young children and pregnant women. The proximity of the large number of brownfields to low-income neighborhoods in our POC drives down housing values, suppresses commercial investment, and limits residents' access to adequate employment, resulting in a disadvantage for target area residents with no relief in sight.

An infusion of funding from this EPA grant will provide needed capital for the assessment of these blighted properties, clearing the way for remediation and revitalization of the POC to include much needed affordable housing, increased greenspace, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit Union City's underserved and sensitive populations, including removal of blight, reduction of exposure to toxic chemicals, lower crime, safer neighborhoods, and access to better public services. This will help our community to understand environmental conditions at our brownfields, reducing the risk of exposure, eliminating sources of contamination, improving the health of our community, and reducing environmental justice disparities within our underserved and sensitive populations.

**2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Contaminants from target area brownfields are affecting our residents' health. Many of the priority sites are believed to be impacted by PCBs, VOCs, petroleum, metals, asbestos, lead paint, and other contaminants. Studies on the health effects of exposure to these contaminants indicate these contaminants are linked to higher incidences of disease/adverse health conditions, some of which are experienced by Randolph County residents at a significantly higher rate than the state averages, and can potentially be linked to impact from nearby brownfields, as depicted in Table 2.

Table 2 – Health Indicators

Disease/Health Condition	Randolph County Rate <sup>4</sup>	Indiana Rate <sup>4</sup>	Difference
Colon & Rectum Cancer <sup>1</sup>	46.3	42.2	+ 10%
Prostate Cancer (Males) <sup>1</sup>	98.1	89.9	+ 9%
Enteric (Intestinal) Disease Cases <sup>2</sup>	52.2	39.9	+ 31%
Chronic Lower Respiratory Disease <sup>3</sup>	72.4	57.2	+ 27%
IN State Dept. of Health Stats Explorer for the following years: <sup>1</sup> 2012-2016 <sup>2</sup> 2017 <sup>3</sup> 2018 <sup>4</sup> Incidence per 100K Residents			

Randolph County ranks 130<sup>th</sup> worst of 3,141 US counties for air pollution-particulate matter including airborne soot, heavy metals, sulfur dioxide, and nitrogen oxides, all of which are emitted by coal-fired power plants (such as the Whitewater Valley plant located just 26 miles to the south of Union City). Contaminants in the air from power generation, congestive highway traffic, and nearby heavy urban industry have affected residents' health (such as elevated rates for chronic lower respiratory disease noted

in Table 2). There are over 110 Union City properties with environmental records on the Indiana Department of Environmental Management's Database, the cumulative effects of which likely contribute to the adverse health conditions impacting our residents.

Finally, reduced access to and a reduced ability to pay for healthcare means that low-income and minority patients are less likely to receive recommended health care services (Urban Institute/Center on Society and Health - 2015), thus they are more likely to experience negative health effects from exposure to brownfield contaminants, again raising environmental justice issues. Though not available at the municipal level, this data is believed to be representative of the POC due to the large number of economically vulnerable people living there.

Removal of the sources of environmental contaminants present at brownfields in our POC and community will reduce the exposure of our disadvantaged populations to these materials. This in turn will help to reduce the disproportionate incidences of disease and other poor health outcomes that these residents are currently experiencing. The first step is assessment of the environmental conditions of target area priority brownfields. Funding from this EPA assessment grant will initiate the revitalization of our low-income neighborhoods in the POC and downtown area by providing that initial infusion of capital to clarify the environmental condition of brownfields and improve the health of our residents.

**2.a.ii(3) Disproportionately Impacted Populations:** The public health impact from target area brownfield properties and industrial operations, and their proximity to our sensitive populations, including impoverished and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing, improve their condition, or even move away due to their financial situation, thus raising significant environmental justice issues. Per the Urban Institute/Center on Society and Health (2015), low-income residents become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. Children living in poverty are 4 times more likely to be in poor or fair health than children in high-income households, and they experience higher rates of asthma, heart conditions, hearing problems, digestive disorders, and elevated blood lead levels. The extremely high poverty rate and low income in the POC are significant when compared to US, state, and City figures (2.a.i). In addition, a large portion of Union City's small but growing minority population is concentrated in the POC, putting them at higher risk from the effects of contaminants from years of industrial activity and the corresponding decline in the quality of life. EPA's EJScreen indicates that our POC residents are subjected to high levels of airborne particulate matter (69<sup>th</sup> percentile in the US for PM 2.5) and ozone (88<sup>th</sup> percentile in Indiana), potentially contributing to the elevated incidences of lower respiratory disease experienced by POC and county residents (Table 2). Additionally, shallow groundwater beneath Union City's low-income neighborhoods in the POC has been significantly contaminated for decades by documented releases of chlorinated solvents and metals from historical industrial operations at the bus body manufacturing site and other nearby former industrial properties. The health effects on Union City residents are not yet known, but chlorinated solvents like those released have been linked to numerous types of cancer and other health conditions, so it is possible that the documented releases have contributed to the negative health conditions experienced by our residents in Table 2.

Funding from an EPA grant will improve the economic status and health of disadvantaged residents by identifying the environmental conditions of area brownfields and reducing or removing the threats from contaminants, creating new affordable housing and opportunities for better jobs. New businesses created will provide employment for residents, increased tax base for the City, eliminate food desert concerns through commercial development that includes grocery stores, and an overall more vibrant economy for our future.

**2.b. Community Engagement, i. Project Involvement & ii. Project Roles:** Several community-based organizations have pledged supporting roles for the City's brownfields program and grant (Table 3). This diverse assemblage of community groups can engage the community at a grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project.

Table 3 – Project Partners

Partner Name	Point of Contact	Specific Role in the Project
Union City Chamber of Commerce	Cheryl Williams, Executive Dir. <a href="mailto:myuioncity.com">myuioncity.com</a> 765-964-5409	Provide meeting facilities, expertise to educate the public on brownfields & benefits of reuse, input on site selection, dissemination of information
The Preservation Society of Union City, Indiana - Ohio	Ted Leahey, President email pending 765-576-1109	Provide planning, public outreach, historic preservation & advocacy, downtown merchant & community liaison, façade grant funding, input on site selection
Community Foundation of Randolph Co.	Lisa Jennings, Executive Dir. <a href="mailto:ljennings@randolphcountyfoundation.org">ljennings@randolphcountyfoundation.org</a> 765-584-9077	Provide project planning, project funding, community project liaison, provide meeting space, input on site selection
Union City Redevelopment Commission	Monte Poling, Chairman, <a href="mailto:citymanager@unioncity-in.gov">citymanager@unioncity-in.gov</a> 765-964-6534	Public outreach, promote brownfield sites for redevelopment, local industry/state economic development liaison, input on site selection, encourage stakeholder involvement, seek leveraging resources
Good News Habitat for Humanity, Inc.	Alan Stamper, Executive Dir. <a href="mailto:alan@goodnewshabitat.org">alan@goodnewshabitat.org</a> (765) 962-5986	Disseminate info about grant, input on site selection, provide public outreach, construct low income housing in target area (when environmental conditions allow)
Randolph County Economic Development Corp.	Ceann Bales, Executive Dir. Nonresponsive – personally identifiable info 765-584-3266	Provide project planning, project funding, community project liaison, provide meeting space, input on site selection

**2.b.iii. Incorporating Community Input:** Union City has a culture of community involvement that we will maintain throughout this grant. Due to COVID-19, we are not currently holding community engagement events. Instead, we have prepared a fact sheet explaining the grant program, our application, and our anticipated outputs/outcomes which is available on our website and in print in municipal offices. 6 to 9 outreach events (2-3 per yr.) will be held throughout the grant period to maintain stakeholder and citizen engagement and gather public input on site selection and prioritization, assessment needs, cleanup decisions, mitigation measures related to the cleanup/redevelopment activity, and reuse planning. Outreach events will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost, or in-kind methods) ensuring that the entire community has an opportunity to provide input. Virtual meetings (Zoom, Teams, etc.) and surveys (SurveyMonkey) will be used when social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes. The community will be updated on progress throughout the grant, as well as have the opportunity to share input through comment opportunities on City and project partner websites. For residents with limited internet or cellular network access, paper surveys will be available at local businesses, enabling community input from additional members of the community. The City has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. We have already begun engaging target area residents, business owners, and community advocates to solicit their input regarding our brownfield project and will continue to do so during the grant period. A public meeting will be held in the first two quarters of grant award to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the City, Chamber of Commerce, and Redevelopment Commission to bring awareness of the redevelopment opportunities the priority sites offer. When developers are identified, they will attend public meetings to describe their plans for reuse. As a projects progress, we will actively involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on site reuse. As stakeholder input is received, we will evaluate it against our development goals and available resources, adopting input that feasibly meets these criteria. As appropriate, we will utilize visioning sessions offered by the Kansas State TAB program to maximize the incorporation of community input.

**3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs:** The City will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan that will be approved by the EPA Project Manager. Once the Work Plan is approved, we will select a Qualified Environmental Professional (QEP) in accordance with federal procurement

regulations (2 CFR 200.317 - 200.326). The City will update its existing brownfield inventory to use as a tool to help accomplish reuse goals. Inventoried sites are prioritized based on the following criteria, in no particular order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Brownfield revitalization progress will be tracked with regular entries into ACRES, public meetings, and coordination with the QEP. Union City and its QEP will complete the following tasks:

**Task /Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization**

*i. Project Implementation:* City staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the City, QEP, EPA, etc. to manage the grant's cooperative agreement. We will complete Quarterly, DBE, Annual reports, and ACRES database entries. We will carefully track contractor costs, comparing to budget, expenditures, and project progress, to ensure that grant funds are utilized within the prescribed 3-year project period. The City, with QEP support, will also update/prioritize the inventory under this task.

*ii. Anticipated Project Schedule:* QEP selected through a competitive bidding process before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period.

*iii. Task/activity Leads:* City & QEP

*iv. Output(s):* Travel - City staff to regional/national brownfields conferences/meetings; prioritized inventory; project performance reports: Quarterly, Annual, and DBE Reports; ACRES Entries; calls, meetings, and correspondence between City, QEP, EPA to manage the grant's cooperative agreement.

**Task/Activity 2: Environmental Investigation**

*i. Project Implementation:* Eligibility determinations will be completed under this task; The QEP will complete Phase I ESAs activities on sites selected by the City. All Phase I ESAs will be conducted by/in accordance with the ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1; The QEP will prepare a Quality Assurance Project Plan (QAPP) which must be approved by the EPA. Once approved, the QEP, directed by the City, will complete Phase II ESAs (after the completion and EPA approval of the Sampling & Analysis Plan/Health & Safety Plan (SAP/HASP) based on environmental conditions identified in the preceding Phase I ESAs.

*ii. Anticipated Project Schedule:* Request eligibility determinations & finalize site access to initial sites for investigation-early 2<sup>nd</sup> Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 11th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

*iii. Task/activity Lead(s):* City & QEP

*iv. Output(s):* est. 10-12 Phase I ESAs; Quality Assurance Project Plan (QAPP), est. 5-9 Phase II ESAs.

**Task/Activity 3: Clean-up Planning:**

*i. Project Implementation:* The QEP, directed by the City, will prepare site specific clean-up plans/documents, including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up funding development (1.c.i).

*ii. Anticipated Project Schedule:* Prepared after Phase I and II ESAs are complete, contamination is present, and cleanup is even necessary. Task 3 activities will continue throughout the grant period.

*iii. Task/activity Lead(s):* City & QEP

*iv. Output(s):* 5-10 cleanup planning documents

**Task/Activity 4: Community Outreach & Involvement:**

*i. Project Implementation:* 6-9 public meetings will be held during the grant period to update the community on brownfield assessment progress and seek public input/involvement. Print and mail material for project/site information and marketing documents may also be funded under this task. The City will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program, and will attend/participate in outreach events. Social media outlets and other online media will be developed/maintained, particularly during the COVID-19 pandemic. Outreach efforts will also inform the public on the progress of brownfield investigation/cleanup planning activities

and provide marketing resources for future development.

*ii. Anticipated Project Schedule:* 1<sup>st</sup> outreach meeting planned for 2<sup>nd</sup> Quarter of grant period, remaining outreach events planned throughout the rest of the grant period.

*iii. Task/activity Lead(s):* City & QEP

*iv. Output(s):* 6-9 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; printed flyers, advertising, , social and online media developed/maintained.

We will work diligently to assure startup activities are completed per the schedule above. The City will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the 3-year cooperative agreement contract. Because there is an extremely high demand for assessments (and site access has already been obtained for some of the priority brownfields) it is likely that funds will be spent prior to the end of the grant period. If activities occur in addition to the priority sites, they will occur after the inventory and prioritization is finalized (early 2<sup>nd</sup> quarter as indicated above). We are proactively communicating with representatives of privately-owned brownfields to gain access in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and creates a positive dialog between property owners, local government, and impacted citizens. Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered.

**Nonresponsive – confidential business information**



**3.c. Measuring Environmental Results:** Tracking, measuring, and evaluating progress will be achieved through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of grant performance, ACRES entries, completion of Work Plan tasks and track investments, including OZs. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in 3.a are not being met, we will create a corrective action plan to identify deficiencies and make the appropriate adjustments to achieve the anticipated outputs on schedule. Further, the Assessment Grant will have the following



measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels cleaned up/redeveloped, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the project, the City will provide a final report to the EPA and our residents summarizing project outputs and outcomes.

**4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organizational Structure & ii Description of Key Staff:** The City's Office of the Mayor and the Planning & Engineering Department will manage this grant. These offices have previously managed many other economic development resources valued at well over \$20M over the past 10 years. They, along with other city staff, have the technical, financial, and administrative ability in place to implement this grant project successfully. Monte Poling, City Manager, will serve as the City's Project Manager. Mr. Poling has been City Manager since 2006, and is responsible for budgets, grant writing/administration, and city planning. He also served 6 years as grant manager for the Indiana Office of Community & Rural Affairs, procuring and managing over \$15M in grant funding. Mr. Poling will be assisted by Steve Shoemaker, Assistant City Manager, who has been with the City for 23 years. Both Poling and Shoemaker will aggressively use their previous brownfield redevelopment and small business growth experience to seek redevelopment opportunities for those sites without secured redevelopment contracts. Ms. Jeannette Walters, Clerk-Treasurer will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. She has provided these services on many other grant and loan programs benefiting the City. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of knowledge of the City's team will allow for a seamless transition to other experienced members.

**4.a.iii. Acquiring Additional Resources:** City staff has a history of working cooperatively with state and federal environmental agencies and procuring contractors including QEPs. Through a competitive bidding and procurement process, the City will select a QEP/consulting firm experienced in administering EPA Brownfields Grants and working with Indiana Department of Environmental Management/Indiana Brownfields Program (IDEM/IBP). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed 3-year project period. This team will be supported by other city departments including planning, finance, utilities, engineering, legal department, and office of the Mayor. As appropriate, we will utilize visioning sessions and other assistance/advice offered by the Technical Assistance for Brownfields (Region 5 TAB program) to maximize the incorporation of community input.

**4.b. Past Performance & Accomplishments, i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments:** Union City previously received an FY12 EPA Coalition Brownfields Assessment Grant (BF00E01071) for \$600K (completed). Skillful execution of the Work Plans resulted in the successful assessment of 12 priority sites. As a result of the grant, over \$15M in additional investment has already been leveraged, creating nearly 75 jobs to date. At the time of this submission, all outputs and outcomes related to the grants have been met and are accurately reflected in the ACRES system.

**4.b.ii(2) Compliance with Grant Requirements:** All Work Plan goals, outputs, and outcomes of the FY12 grant were achieved, and all reports including Quarterly Reports, Annual Reports, MBE/WBE Utilization Reports, ACRES submissions, etc. were completed on time. The City was in full compliance with the terms and conditions of the FY12 grant Cooperative Agreement and 100% of the funds were expended. As with the 2012 grant, Union City has a clear plan in place for this FY21 grant to aggressively address targeted brownfields, and seek firm leveraging commitments to redevelop sites into viable community assets.



### **III.B. Threshold Criteria for Assessment Grants**

#### **III.B.1 Applicant Eligibility**

The City of Union City meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

#### **III.B.2 Community Involvement**

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. Union City will utilize numerous means to engage the community, solicit public and stakeholder participation, and advertise public meetings. Outreach events will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. Virtual meetings (Zoom, Teams, etc.) and surveys (SurveyMonkey) will be used when social distancing or other restrictions limit in-person community meetings due to COVID-19 or other causes. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

#### **III.B.3 Expenditure of Assessment Grant Funds**

This criterion is not applicable as Union City is not a current EPA Brownfields Assessment Grant recipient.

### **III.C. Additional Threshold Criteria for Site-Specific Proposals Only**

This criterion is not applicable for a U.S. EPA Community-wide Brownfields Assessment Grant application.

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

10/28/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

UNION CITY, CITY OF

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

35-1216600

\* c. Organizational DUNS:

6055274690000

### d. Address:

\* Street1:

105 N Columbia Street

Street2:

\* City:

Union City

County/Parish:

\* State:

IN: Indiana

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

47390-0000

### e. Organizational Unit:

Department Name:

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr .

\* First Name:

MONTE

Middle Name:

\* Last Name:

POLING

Suffix:

Title:

CITY MANAGER

Organizational Affiliation:

\* Telephone Number:

765-964-6534

Fax Number:

\* Email:

CityManager@UnionCity-IN.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

### CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-06

### \* Title:

FY21 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

### 13. Competition Identification Number:

### Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

FY21 CITY OF UNION CITY EPA COMMUNITY WIDE BROWNFIELDS ASSESSMENT GRANT FOR HAZARDOUS SUBSTANCES AND PETROLEUM

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: